

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
SARAH PALIN	:	No. 17 Civ. 4853 (JSR)
	:	
Plaintiff,	:	
	:	
	:	ECF Case
-against-	:	
	:	
	:	
THE NEW YORK TIMES COMPANY and JAMES	:	
BENNET,	:	
	:	
Defendants.	:	
-----	X	

NOTICE OF MOTION

PLEASE TAKE NOTICE that, pursuant to the parties' conference with the Court on December 16, 2019, defendants The New York Times Company and James Bennet hereby respectfully file their motion pursuant to Fed. R. Civ. Proc. 12(c) to dismiss plaintiff's claim for disgorgement damages; plaintiff shall file her response on or before January 10, 2020, and defendants shall file their reply, if any, on or before January 17, 2020. If necessary, oral argument on the motion will be held before the Honorable Jed S. Rakoff, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 14B, New York 10007 at such time as shall be determined by the Court.

Dated: January 2, 2020

Respectfully submitted,

BALLARD SPAHR LLP

By: /s/ Jay Ward Brown

Jay Ward Brown

Thomas B. Sullivan

1675 Broadway, 19th Floor

New York, NY 10019-5820

Phone: (212) 223-0200

Fax: (212) 223-1942

brownjay@ballardspahr.com

sullivant@ballardspahr.com

Counsel for Defendants